

SDunlap.txt

From: sa54d@earthlink.net%inter2 [sa54d@earthlink.net] on behalf of sa54d@earthlink.net
Sent: Thursday, March 03, 2005 9:12 PM
To: Torres, Francine
Subject: organic dairy production

To the National Organic Standards Board:

I want to express full support for the recent Livestock Committee Pasture Requirement recommendations. Enforcement of true access to pasture is necessary so that all organic ruminants receive a significant, and legally mandated, portion of their total feed intake from pasture. This includes an allowance of only narrowly defined, short-term ("temporary") exceptions to pasture. I strongly agree that lactation is not a "stage of production" during which dairy cows may be denied pasture for grazing. I urge the NOSB to recommend specific wording be added to the Pasture Rule to keep this type of abuse from continuing to occur.

Pasture is an essential component of organic dairy production from many perspectives:

- *For the health and promotion of the natural behavior of the cow

- *Respecting the perspective of the consumer and their belief that organic milk is produced by cows having legitimates access to pasture

- *Assuring the consumer's right to the extra nutritional advantage provided by grazing cows

- *Acknowledgement of the many environmental benefits provided by pasture, including lower energy use (avoidance of machine-intensive systems of animal feed delivery and manure disposal), reduced soil erosion and the protection of water and air quality.

I further support the additional recommendations of The Cornucopia Institute, Northeast Organic Dairy Producers Alliance, and other groups who advocate specific and additional language including:

1. That the pasture definition be further refined such that "pasture" is land managed to maintain or improve soil, water, and vegetative resources and to provide maximum feed value by growing suitable grasses and other forages from which animals graze plant material still connected to its roots.
2. Organic dairy animals, from 12 months of age and up, must consume no less than 30% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three lactating dairy cows per acre.
3. Farms not in compliance with the above should be allowed one year to come into compliance but will need to file an updated and enforceable farm plan, providing for adequate pasture, within 60 days of the publishing of any new pasture guidance document by the USDA.

Note: Based on inspections/farm plans, many farms will have the capacity to create pasture supplying more than 30% of feed intake; at the same time, to be able to maximize feed from pasture, most farms will have a stocking rate well below the three cow maximum. It is incumbent upon farms and certifiers to maximize pasture potential to meet the spirit of the law, not just the minimum quantitative requirements provided.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality.

Sincerely,

SDunlap.txt

Steven Dunlap
139 Vicksburg St.
San Francisco, CA 94114